

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
CRIMINAL NO. 18-150(1) (DWF/HB)

UNITED STATES OF AMERICA,)
)
Plaintiff,) **GOVERNMENT'S PROPOSED**
) **VOIR DIRE QUESTIONS**
v.)
)
MICHAEL HARI,)
)
Defendant.)

1. Thank you for providing your occupation for you and your spouse. Please provide the same information if you have adult children.
2. Where were you born and raised?
3. If you listed that you belong to any organizations or groups, do you hold a position or have any duties within that organization or group? To include any position of responsibility in your church, temple, mosque, or other religious organization? If so, what are they?
4. Have you or anyone close to you ever served in the military, including the reserves, National Guard or ROTC, or worked for the military in a civilian capacity?
5. Have you ever written to any newspapers, or magazine; called in to a television, radio, or internet program; or written on any internet forum or blog to express your opinion about a political issue or current event?
6. Do you regularly watch any law-related programing (such as CSI, Law & Order, etc.)? Which ones? Based on the programs you watch, have you formed an opinion

of the type of evidence necessary for the government to satisfy its burden of proof?

If so, can you put those opinions aside and decide the case on the evidence presented in the courtroom during the course of this trial?

7. Have you traveled outside the United States in the last ten years? If so, where and for what purpose?
8. Have you or anyone close to you ever been a member of, or otherwise involved with, any group that takes a position on religious, social, political, or legal issues? If yes, who was involved and what was the name of the organization?
9. Have you ever participated in a protest or rally? If so, please explain.
10. Have you or anyone close to you been a victim of discrimination on the basis of race, gender, religion, national origin, ethnicity, or sexual orientation? If yes, please explain.
11. Have you heard of this case before today? If so, when, and how?
12. Are you acquainted with the defendant, Michael Hari, his lawyers, Shannon Elkins and James Becker, the government's lawyers, Julie Allyn, John Docherty and Allison Ethen, or the FBI case agents, Brenda Kane and Joel Smith?
13. Have you or any member of your family had any type of encounter with the Federal Bureau of Investigation (FBI) or the Bloomington Police Department, or any other law enforcement agency? What was the nature of the encounter? Were you satisfied with the manner in which the matter was resolved? Why or why not?
14. Have you, or anyone close to you ever had any education, training, or experience in with militia groups? With survivalist or prepper groups?

15. Some evidence in the trial may relate to militia groups. Do you have any experience or interaction with militia groups that may affect how you evaluate the testimony of a witness who belongs to a militia?
16. Do you have any opinions or feelings about militia groups that might affect your ability to be a fair and impartial juror?
17. Some people believe that current events can be explained by reference to the internet postings of a person identified as “Q.” If you are familiar with this, do you believe QAnon is partly true, entirely true, or not true at all?
18. Some evidence in the trial may relate to Muslims. Do you have any opinions or feelings about Muslims that might affect your ability to be a fair and impartial juror?
19. How familiar are you with the teachings and practice of Islam?
20. How often do you have personal interactions with persons who are Muslim or practice the religion of Islam?
21. Have you ever been to a Mosque or talked to a Muslim person about her religion?
22. Do you have any opinions or feelings about people who come to the United States from predominantly Muslim countries that might affect your ability to be a fair and impartial juror?
23. Do you have any opinions or feelings about people who live in the United States but who do not speak English that might affect your ability to be a fair and impartial juror? Do you think that immigrants should be required to learn English in order to stay in the United States?

24. Some witnesses in this case may testify through a translator. Would the use of a translator affect how you evaluate the testimony of that witness?
25. Some of the witnesses who will testify will admit to having committed crimes themselves. Some of those witnesses have been or might be prosecuted by the United States and are testifying in hopes of receiving a favorable sentencing recommendation by the United States Attorney's Office as consideration for their cooperation. Although the testimony of these witnesses must be examined with great care, it is proper for the government to call them to testify. Do any of you have any strong opinions about the government calling witnesses who have themselves committed crimes, such as cooperating defendants, to testify in a criminal case knowing that they may receive a benefit for this testimony? Does anyone believe that it is never acceptable for the government to enter into an agreement with other criminal participants like what was just described?
26. Similarly, the testimony in this case may include testimony from witnesses who have admitted to withholding information from the FBI during the FBI's investigation. Although the testimony of these witnesses must be examined with great care, it is proper for the government to call them to testify. Do you have beliefs or opinions that would affect your ability to evaluate such testimony from such witnesses fairly and impartially?
27. Does anyone believe that they would never accept the testimony of a cooperating defendant; even if they believed what this person said was true, just because they are testifying in hopes of receiving a benefit from the government?

28. Are any of you familiar with firearms? How did you become familiar with firearms? Do you own any firearms? What types, and for what purpose?
29. Are any of you familiar with homemade explosive devices? How did you become familiar with such explosive devices? Specifically, are you familiar with pipe bombs? Have you ever made a pipe bomb before? Other types of bombs? Have you ever looked up instructions on how to make a pipe bomb? If so, what were the circumstances surrounding any attempts to make a pipe bomb?
30. Are any of you opposed to the federal laws making it a requirement for a person who has a pipe bomb to register their possession of the pipe bomb?
31. Are any of you opposed to the federal government putting any restrictions on how a person could possess pipe bombs?
32. Are any of you opposed to the federal government putting any restrictions on how a person could possess firearms?
33. Have you or any of your close friends or relatives ever participated in or belonged to any organization which advocates for or against gun control laws? If not, do you agree with the beliefs of any such organizations? Do you draw a distinction between gun control laws regulating fully automatic weapons? If you are selected as a juror, will those views play any role in your decision in this case?
34. Or, have you or any of your close friends or relatives ever participated in or belonged to any organization which opposes the law enforcement policies of the United States, for example, an organization that opposes the marijuana laws? If not, do you

agree with the beliefs of any such organizations? If you are selected as a juror, will those views about the government's laws play any role in your decision in this case?

35. Do you disagree in any way with the full enforcement of federal, state, or local laws? Would you consider yourself anti-Government?
36. Does anyone here have any moral, religious, or personal beliefs which would make you reluctant to serve on a criminal jury? Would those beliefs make it difficult in any way for you to judge a fellow citizen? Can you set aside any issues or concerns of sentencing and punishment and understand it is the Judge's job to sentence a defendant if the defendant is found guilty?
37. If selected as a juror in this case, will you apply the law as given by the Court, regardless of whether you agree or disagree with it?
38. Do you have any disagreement about the operation of the criminal justice system in the United States?

39. Is there any reason why you feel you cannot be a fair and impartial juror in this case?

Date: September 29, 2020

Respectfully Submitted,

ERICA H. MacDONALD
United States Attorney

s/ Julie E. Allyn

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